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14 UNITED STATES OF AMERICA

15 UNITED STATES DISTRICT COURT

16 FOR THE CENTRAL DISTRICT OF CALIFORNIA

17 UNITED STATES OF AMERICA,

18 Plaintiff,

19 v.

20 JOSE LANDA-RODRIGUEZ, et al.,
[#42 MARLON CORNEJO]

21 Defendants.
22

No. CR 18-00173-GW-42

PLEA AGREEMENT FOR MARLON CORNEJO

23 1. This constitutes the plea agreement between MARLON CORNEJO
24 ("defendant") and the United States Attorney's Office for the Central
25 District of California (the "USAO") in the above-captioned case. This
26 agreement is limited to the USAO and cannot bind any other federal,
27 state, local, or foreign prosecuting, enforcement, administrative, or
28 regulatory authority.

DEFENDANT'S OBLIGATIONS

2. Defendant agrees to:

a. At the earliest opportunity requested by the USAO and provided by the Court, appear and plead guilty to Count One and a lesser-included offense in Count Six of the Indictment in United States v. Jose Landa-Rodriguez, et al., CR No. 18-00173-GW, which charge defendant with conspiring to engage in racketeering activity in violation of 18 U.S.C. § 1962(d) and conspiring to distribute controlled substances in violation of 21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C), respectively.

b. Not contest facts agreed to in this agreement.

c. Abide by all agreements regarding sentencing contained in this agreement.

d. Appear for all court appearances, surrender as ordered for service of sentence, obey all conditions of any bond, and obey any other ongoing court order in this matter.

e. Not commit any crime; however, offenses that would be excluded for sentencing purposes under United States Sentencing Guidelines ("USSG" or "Sentencing Guidelines") § 4A1.2(c) are not within the scope of this agreement.

f. Be truthful at all times with the Probation & Pretrial Services Office and the Court.

g. Pay the applicable special assessments at or before the time of sentencing unless defendant lacks the ability to pay and prior to sentencing submits a completed financial statement on a form to be provided by the USAO.

h. Agree to, and not oppose, the imposition of the following condition of probation or supervised release: Defendant

1 shall submit to the search and seizure, with or without probable
2 cause or reasonable suspicion, of defendant's person, vehicle,
3 residence, digital devices, including cell phones, and any other real
4 or personal property under defendant's control.

5 THE USAO'S OBLIGATIONS

6 3. The USAO agrees to:

7 a. Not contest facts agreed to in this agreement.

8 b. Abide by all agreements regarding sentencing contained
9 in this agreement.

10 c. At the time of sentencing, provided that defendant
11 demonstrates an acceptance of responsibility for the offense up to
12 and including the time of sentencing, recommend a two-level reduction
13 in the applicable Sentencing Guidelines offense level, pursuant to
14 USSG § 3E1.1, and recommend and, if necessary, move for an additional
15 one-level reduction if available under that section.

16 d. Recommend that defendant be sentenced to a term of
17 imprisonment no higher than the low end of the applicable Sentencing
18 Guidelines range, provided that the offense level used by the Court
19 to determine that range is 16 or higher and provided that the Court
20 does not depart downward in offense level or criminal history
21 category. For purposes of this agreement, the low end of the
22 Sentencing Guidelines range is that defined by the Sentencing Table
23 in U.S.S.G. Chapter 5, Part A.

24 NATURE OF THE OFFENSES

25 4. Defendant understands that for defendant to be guilty of
26 the crime charged in Count One, that is, racketeer influenced and
27 corrupt organizations ("RICO") conspiracy, in violation of 18 U.S.C.
28 § 1962(d), the following must be true: (1) an agreement existed

1 between two or more persons employed by or associated with an
2 enterprise that would have affected interstate or foreign commerce,
3 to conduct or participate in, either directly or indirectly, the
4 conduct of affairs of the enterprise through a pattern of
5 racketeering activity; (2) defendant joined or became a member of the
6 agreement with knowledge of its purpose, and (3) defendant agreed
7 that someone, not necessarily defendant, would commit at least two
8 acts of racketeering activity in furtherance of the conspiracy.

9 5. An "enterprise" includes any individual, partnership,
10 corporation, association, or other legal entity, and any union or
11 group of individuals associated in fact although not a legal entity.
12 "Racketeering activity" includes any act or threat involving murder,
13 kidnaping, robbery, or extortion, which is chargeable under state law
14 and punishable by imprisonment for more than one year; any offense
15 involving dealing in a controlled substance in violation of 21 U.S.C.
16 §§ 841 or 846; witness tampering in violation of 18 U.S.C. § 1312;
17 retaliating against a witness in violation of 18 U.S.C. § 1513; money
18 laundering in violation of 18 U.S.C. §§ 1956 or 1957; identity fraud
19 in violation of 18 U.S.C. § 1028; and access device fraud in
20 violation of 18 U.S.C. § 1029.

21 6. A "pattern of racketeering activity" is at least two acts
22 of racketeering activity, the last of which occurred within ten years
23 after the commission of a prior act of racketeering. To establish a
24 pattern, the racketeering acts must have a "nexus" to the enterprise
25 and be related, i.e., criminal acts that have the same or similar
26 purposes, results, participants, victims, or methods of commission,
27 or otherwise are interrelated by distinguishing characteristics and
28 are not isolated. The acts of racketeering activity themselves must

1 either extend over a substantial period of time or they must pose a
2 threat of continued criminal activity. Defendant admits that
3 defendant agreed that defendant or a co-conspirator would commit two
4 acts of racketeering activity and is, in fact, guilty of this offense
5 as described in Count One of the Indictment.

6 7. Defendant understands that for defendant to be guilty of
7 the offense charged in Count Six, that is, conspiracy to distribute
8 controlled substances, in violation of 21 U.S.C. §§ 846 and
9 841(a)(1), the following must be true: (1) there was an agreement
10 between two or more persons to distribute methamphetamine; and (2)
11 defendant joined in the agreement knowing of this object and
12 intending to help accomplish it. Defendant admits that defendant is,
13 in fact, guilty of this offense as described in Count Six of the
14 Indictment.

15 PENALTIES

16 8. Defendant understands that the statutory maximum sentence
17 that the Court can impose for a violation of 18 U.S.C. §§ 1962(d),
18 1963(a), is: twenty years' imprisonment; a three-year period of
19 supervised release; a fine of \$250,000 or twice the gross gain or
20 gross loss resulting from the offense, whichever is greatest; and a
21 mandatory special assessment of \$100.

22 9. Defendant understands that the statutory maximum sentence
23 that the Court can impose for a violation of 21 U.S.C. §§ 846,
24 841(a)(1), and 841(b)(1)(C), is: 20 years' imprisonment; a lifetime
25 period of supervised release; a fine of \$1,000,000; and a mandatory
26 special assessment of \$100.

27 10. Defendant understands that the statutory mandatory minimum
28 sentence that the Court must impose for a violation of 21 U.S.C.

1 §§ 846, 841(a)(1), and 841(b)(1)(C) is: a three-year period of
2 supervised release and a mandatory special assessment of \$100.

3 11. Defendant understands, therefore, that the total maximum
4 sentence for all offenses to which defendant is pleading guilty is:
5 40 years' imprisonment; a lifetime period of supervised release; a
6 fine of \$1,250,000; and a mandatory special assessment of \$200.

7 12. Defendant understands that supervised release is a period
8 of time following imprisonment during which defendant will be subject
9 to various restrictions and requirements. Defendant understands that
10 if defendant violates one or more of the conditions of any supervised
11 release imposed, defendant may be returned to prison for all or part
12 of the term of supervised release authorized by statute for the
13 offense that resulted in the term of supervised release, which could
14 result in defendant serving a total term of imprisonment greater than
15 the statutory maximum stated above.

16 13. Defendant understands that, by pleading guilty, defendant
17 may be giving up valuable government benefits and valuable civic
18 rights, such as the right to vote, the right to possess a firearm,
19 the right to hold office, and the right to serve on a jury.
20 Defendant understands that once the Court accepts defendant's guilty
21 pleas, it will be a federal felony for defendant to possess a firearm
22 or ammunition. Defendant understands that the convictions in this
23 case may also subject defendant to various other collateral
24 consequences, including but not limited to revocation of probation,
25 parole, or supervised release in another case and suspension or
26 revocation of a professional license. Defendant understands that
27 unanticipated collateral consequences will not serve as grounds to
28 withdraw defendant's guilty pleas.

1 14. Defendant and his counsel have discussed the fact that, and
2 defendant understands that, if defendant is not a United States
3 citizen, the convictions in this case makes it practically inevitable
4 and a virtual certainty that defendant will be removed or deported
5 from the United States. Defendant may also be denied United States
6 citizenship and admission to the United States in the future.
7 Defendant understands that while there may be arguments that
8 defendant can raise in immigration proceedings to avoid or delay
9 removal, removal is presumptively mandatory and a virtual certainty
10 in this case. Defendant further understands that removal and
11 immigration consequences are the subject of a separate proceeding and
12 that no one, including his attorney or the Court, can predict to an
13 absolute certainty the effect of his convictions on his immigration
14 status. Defendant nevertheless affirms that he wants to plead guilty
15 regardless of any immigration consequences that his pleas may entail,
16 even if the consequence is automatic removal from the United States.

17 15. Defendant understands that under 21 U.S.C. § 862a,
18 defendant will not be eligible for assistance under state programs
19 funded under the Social Security Act or Federal Food Stamp Act or for
20 federal food stamp program benefits, and that any such benefits or
21 assistance received by defendant's family members will be reduced to
22 reflect defendant's ineligibility.

23 FACTUAL BASIS

24 16. Defendant admits that defendant is, in fact, guilty of the
25 offenses to which defendant is agreeing to plead guilty. Defendant
26 and the USAO agree to the statement of facts provided below and agree
27 that this statement of facts is sufficient to support pleas of guilty
28 to the charges described in this agreement and to establish the

1 Sentencing Guidelines factors set forth in paragraph 18 below but is
2 not meant to be a complete recitation of all facts relevant to the
3 underlying criminal conduct or all facts known to either party that
4 relate to that conduct.

5 a. Throughout the period described in the Indictment, the
6 Mexican Mafia LACJ Enterprise (the "Enterprise") was a criminal
7 enterprise composed of a group of individuals associated for a common
8 purpose of engaging in a course of conduct, which included the
9 trafficking of methamphetamine, heroin, and other controlled
10 substances, extortion, money laundering, witness intimidation, and
11 witness retaliation. In that regard, the Enterprise controlled the
12 majority of drug distribution among Hispanic inmates inside of the
13 Los Angeles County Jail ("LACJ"), and maintained control and
14 authority over Hispanic inmates of the LACJ through threats,
15 intimidation, and acts of violence against those inmates.

16 b. The Enterprise committed, attempted to commit, and
17 threatened to commit acts of violence, including assaults and
18 murders, to protect and expand the Enterprise's criminal operation,
19 and promoted a climate of fear among rival gang members, potential
20 witnesses to the Enterprise's criminal conduct, Hispanic gang members
21 and inmates, and those who may cooperate with law enforcement
22 authorities both within and outside of LACJ.

23 c. The Enterprise smuggled controlled substances into
24 LACJ for distribution, and used the threat of violence to extort
25 others engaged in the smuggling and distribution of controlled
26 substances within LACJ, as a means to generate income. The
27 Enterprise engaged in extortion of inmates by other means, including
28 by the operation of a "kitty" within LACJ and by issuing fines for

1 violations of Mexican Mafia rules, as other sources of generating
2 income. Further, the Enterprise used the threat of violence to
3 profit from drug trafficking outside of LACJ by members of street
4 gangs controlled by or affiliated with the Enterprise, by requiring
5 the payment by these gangs of a portion of their drug proceeds, which
6 amounted to extortion of drug dealers.

7 d. As a result of its drug trafficking conduct,
8 throughout the period described in the indictment, and as known to
9 defendant, Enterprise members and associates engaged in, and their
10 activities in some way affected, commerce between one state and
11 another state.

12 e. Prior to and continuing during and after September
13 2012, an agreement existed between two or more persons to
14 participate, either directly or indirectly, in the affairs of the
15 Enterprise through pattern of racketeering activity. Beginning no
16 later than September 10, 2012, defendant MARLON CORNEJO joined and
17 became a member of that agreement, knowing of its purpose, knowing it
18 was illegal, and intending to help accomplish it. In that capacity,
19 defendant agreed that a conspirator, whether defendant or someone
20 else, would commit at least two acts of racketeering activity, in the
21 form of dealing in controlled substances and money laundering, which
22 acts had a relationship to another and to the enterprise, and posed a
23 threat of continued criminal activity.

24 f. In furtherance of the racketeering and drug
25 trafficking conspiracies, defendant committed at least the following
26 acts:

27 i. On September 10, 2012, while defendant was
28 incarcerated in LACJ, defendant received approximately 2.25 grams of

1 cocaine and .09 grams of methamphetamine. Defendant secreted those
 2 drugs in his cell, knowing and intending that the drugs would be
 3 provided to another co-conspirator. Defendant understood and agreed
 4 that after the Enterprise sold the cocaine and methamphetamine, the
 5 proceeds for those sales would be transferred through stored value
 6 cards or postal money orders

7 SENTENCING FACTORS

8 17. Defendant understands that in determining defendant's
 9 sentence the Court is required to calculate the applicable Sentencing
 10 Guidelines range and to consider that range, possible departures
 11 under the Sentencing Guidelines, and the other sentencing factors set
 12 forth in 18 U.S.C. § 3553(a). Defendant understands that the
 13 Sentencing Guidelines are advisory only, that defendant cannot have
 14 any expectation of receiving a sentence within the calculated
 15 Sentencing Guidelines range, and that after considering the
 16 Sentencing Guidelines and the other § 3553(a) factors, the Court will
 17 be free to exercise its discretion to impose any sentence it finds
 18 appropriate between the mandatory minimum and up to the maximum set
 19 by statute for the crimes of conviction.

20 18. Defendant and the USAO agree to the following applicable
 21 Sentencing Guidelines factors:

22 Count One

23 GROUP 1 (Controlled Substances)		
24 Base Offense Level:	12	[USSG § 2D1.1(c) (14)]
25 Distribution of Controlled 26 Substance in 27 Prison/Correctional/Detention 28 Facility	+2	[USSG § 2D1.1(b) (4)]

GROUP 2 (Money Laundering)		
Base Offense Level	14	[USSG § 2S1.1(a)(1)]

Count Six

Base Offense Level:	12	[USSG § 2D1.1(c)(14)]
Distribution of Controlled Substance in Prison/Correctional/Detention Facility	+2	[USSG § 2D1.1(b)(4)]

19. Defendant and the USAO reserve the right to argue that additional specific offense characteristics, adjustments, and departures under the Sentencing Guidelines are appropriate. Defendant understands that defendant's offense level could be increased if defendant is a career offender under USSG §§ 4B1.1 and 4B1.2. If defendant's offense level is so altered, defendant and the USAO will not be bound by the agreement to Sentencing Guideline factors set forth above.

20. Defendant understands that there is no agreement as to defendant's criminal history or criminal history category.

21. Defendant and the USAO reserve the right to argue for a sentence outside the sentencing range established by the Sentencing Guidelines based on the factors set forth in 18 U.S.C. § 3553(a)(1), (a)(2), (a)(3), (a)(6), and (a)(7).

WAIVER OF CONSTITUTIONAL RIGHTS

22. Defendant understands that by pleading guilty, defendant gives up the following rights:

- a. The right to persist in a plea of not guilty.
- b. The right to a speedy and public trial by jury.

///

1 c. The right to be represented by counsel - and if
2 necessary have the Court appoint counsel -- at trial. Defendant
3 understands, however, that, defendant retains the right to be
4 represented by counsel - and if necessary have the Court appoint
5 counsel - at every other stage of the proceeding.

6 d. The right to be presumed innocent and to have the
7 burden of proof placed on the government to prove defendant guilty
8 beyond a reasonable doubt.

9 e. The right to confront and cross-examine witnesses
10 against defendant.

11 f. The right to testify and to present evidence in
12 opposition to the charges, including the right to compel the
13 attendance of witnesses to testify.

14 g. The right not to be compelled to testify, and, if
15 defendant chose not to testify or present evidence, to have that
16 choice not be used against defendant.

17 h. Any and all rights to pursue any affirmative defenses,
18 Fourth Amendment or Fifth Amendment claims, and other pretrial
19 motions that have been filed or could be filed.

20 WAIVER OF APPEAL OF CONVICTIONS

21 23. Defendant understands that, with the exception of an appeal
22 based on a claim that defendant's guilty pleas were involuntary, by
23 pleading guilty defendant is waiving and giving up any right to
24 appeal defendant's convictions on the offenses to which defendant is
25 pleading guilty. Defendant understands that this waiver includes,
26 but is not limited to, arguments that the statutes to which defendant
27 is pleading guilty are unconstitutional, and any and all claims that
28 ///

1 the statement of facts provided herein is insufficient to support
2 defendant's pleas of guilty

3 LIMITED MUTUAL WAIVER OF APPEAL OF SENTENCE

4 24. Defendant agrees that, provided the Court imposes a total
5 term of imprisonment on all counts of conviction of no more than the
6 high-end of the applicable guideline range corresponding with a total
7 offense level of 16 and the criminal history category as found by the
8 Court, defendant gives up the right to appeal all of the following:

9 (a) the procedures and calculations used to determine and impose any
10 portion of the sentence, with the exception of the Court's
11 calculation of defendant's criminal history category; (b) the term of
12 imprisonment imposed by the Court, except to the extent it depends on
13 the Court's calculation of defendant's criminal history category;
14 (c) the fine imposed by the Court, provided it is within the
15 statutory maximum; (d) the term of probation or supervised release
16 imposed by the Court, provided it is within the statutory maximum;
17 and (e) any of the following conditions of probation or supervised
18 release imposed by the Court: the conditions set forth in General
19 Order 20-04 of this Court; the drug testing conditions mandated by 18
20 U.S.C. §§ 3563(a)(5) and 3583(d); the alcohol and drug use conditions
21 authorized by 18 U.S.C. § 3563(b)(7); and the and search condition
22 agreed to in Paragraph 2.

23 25. The USAO agrees that provided that all portions of the
24 sentence are at or above the applicable statutory minimum and at or
25 below the statutory maximum specified above, the USAO gives up its
26 right to appeal any portion of the sentence.

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1 RESULT OF WITHDRAWAL OF GUILTY PLEAS

2 26. Defendant agrees that if, after entering guilty pleas
3 pursuant to this agreement, defendant seeks to withdraw and succeeds
4 in withdrawing defendant's guilty pleas on any basis other than a
5 claim and finding that entry into this plea agreement was
6 involuntary, then the USAO will be relieved of all of its obligations
7 under this agreement.

8 RESULT OF VACATUR, REVERSAL OR SET-ASIDE

9 27. Defendant agrees that if any count of conviction is
10 vacated, reversed, or set aside, the USAO may: (a) ask the Court to
11 resentence defendant on any remaining count of conviction, with both
12 the USAO and defendant being released from any stipulations regarding
13 sentencing contained in this agreement, (b) ask the Court to void the
14 entire plea agreement and vacate defendant's guilty plea on any
15 remaining count of conviction, with both the USAO and defendant being
16 released from all their obligations under this agreement, or
17 (c) leave defendant's remaining convictions, sentence, and plea
18 agreement intact. Defendant agrees that the choice among these three
19 options rests in the exclusive discretion of the USAO.

20 EFFECTIVE DATE OF AGREEMENT

21 28. This agreement is effective upon signature and execution of
22 all required certifications by defendant, defendant's counsel, and an
23 Assistant United States Attorney.

24 BREACH OF AGREEMENT

25 29. Defendant agrees that if defendant, at any time after the
26 signature of this agreement and execution of all required
27 certifications by defendant, defendant's counsel, and an Assistant
28 United States Attorney, knowingly violates or fails to perform any of

1 defendant's obligations under this agreement ("a breach"), the USAO
2 may declare the agreement breached. All of defendant's obligations
3 are material, a single breach of the agreement is sufficient for the
4 USAO to declare a breach, and defendant shall not be deemed to have
5 cured a breach without the express agreement of the USAO in writing.
6 If the USAO declares the agreement breached, and the Court finds such
7 a breach to have occurred, then: (a) if defendant has previously
8 entered guilty pleas pursuant to this agreement, defendant will not
9 be able to withdraw the guilty pleas, and (b) the USAO will be
10 relieved of all its obligations under this agreement.

11 COURT AND PROBATION & PRETRIAL SERVICES OFFICE NOT PARTIES

12 30. Defendant understands that the Court and the Probation &
13 Pretrial Services Office are not parties to this agreement and need
14 not accept any of the USAO's sentencing recommendations or the
15 parties' agreements to facts or sentencing factors.

16 31. Defendant understands that both defendant and the USAO are
17 free to: (a) supplement the facts by supplying relevant information
18 to the Probation & Pretrial Services Office and the Court,
19 (b) correct any and all factual misstatements relating to the Court's
20 Sentencing Guidelines calculations and determination of an
21 appropriate sentence under the § 3553(a) factors, and (c) argue on
22 appeal and collateral review that the Court's Sentencing Guidelines
23 calculations and the sentence it chooses to impose are not error,
24 although each party agrees to maintain its view that the calculations
25 in paragraph 18 are consistent with the facts of this case. This
26 paragraph permits both the USAO and defendant to submit full and
27 complete factual information to the Probation & Pretrial Services
28 Office and the Court, even if that factual information may be viewed

1 as inconsistent with the factual basis and sentencing factors agreed
2 to in this agreement.

3 32. Defendant understands that even if the Court ignores any
4 sentencing recommendation, finds facts or reaches conclusions
5 different from those agreed to, and/or imposes any sentence up to the
6 maximum established by statute, defendant cannot, for that reason,
7 withdraw defendant's guilty pleas, and defendant will remain bound to
8 fulfill all defendant's obligations under this agreement. Defendant
9 understands that no one -- not the prosecutor, defendant's attorney,
10 or the Court -- can make a binding prediction or promise regarding
11 the sentence defendant will receive, except that it will be within
12 the statutory maximum.

13 NO ADDITIONAL AGREEMENTS

14 33. Defendant understands that, except as set forth herein and
15 in any contemporaneous agreement or addendum signed by all parties,
16 there are no promises, understandings, or agreements between the USAO
17 and defendant or defendant's attorney, and that no additional
18 promise, understanding, or agreement may be entered into unless in a
19 writing signed by all parties or on the record in court.

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PLEA AGREEMENT PART OF THE GUILTY PLEA HEARING

34. The parties agree that this agreement will be considered part of the record of defendant's guilty plea hearing as if the entire agreement had been read into the record of the proceeding.

AGREED AND ACCEPTED


UNITED STATES ATTORNEY'S OFFICE
FOR THE CENTRAL DISTRICT OF
CALIFORNIA

TRACY L. WILKISON
Acting United States Attorney

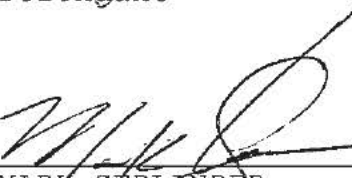

SHAWN J. NELSON
MAX B. SHINER
KEITH D. ELLISON
Assistant United States Attorneys

October 8, 2021

Date


MARLON CORNEJO
Defendant

9-17-2021
Date


MARK SEDLANDER
Attorney for Defendant
MARLON CORNEJO

October 8, 2021
Date

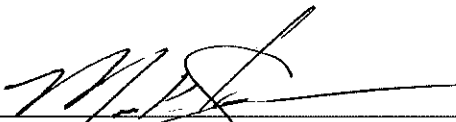
CERTIFICATION OF DEFENDANT

I have read this agreement in its entirety. I have had enough time to review and consider this agreement, and I have carefully and thoroughly discussed every part of it with my attorney. I understand the terms of this agreement, and I voluntarily agree to those terms. I have discussed the evidence with my attorney, and my attorney has advised me of my rights, of possible pretrial motions that might be filed, of possible defenses that might be asserted either prior to or at trial, of the sentencing factors set forth in 18 U.S.C. § 3553(a), of relevant Sentencing Guidelines provisions, and of the consequences of entering into this agreement. No promises, inducements, or representations of any kind have been made to me other than those contained in this agreement or in an agreement signed by all parties or on the record in court. No one has threatened or forced me in any way to enter into this agreement. I am satisfied with the representation of my attorney in this matter, and I am pleading guilty because I am guilty of the charges and wish to take advantage of the promises set forth in this agreement, and not for any other reason.


MARLON CORNEJO
Defendant9-17-2021
Date

CERTIFICATION OF DEFENDANT'S ATTORNEY

I am MARLON CORNEJO's attorney. I have carefully and thoroughly discussed every part of this agreement with my client. Further, I have fully advised my client of his rights, of possible pretrial motions that might be filed, of possible defenses that might be asserted either prior to or at trial, of the sentencing factors set forth in 18 U.S.C. § 3553(a), of relevant Sentencing Guidelines provisions, and of the consequences of entering into this agreement. To my knowledge: no promises, inducements, or representations of any kind have been made to my client other than those contained in this agreement or in an agreement signed by all parties or on the record in court; no one has threatened or forced my client in any way to enter into this agreement; my client's decision to enter into this agreement is informed and voluntary; and the factual basis set forth in this agreement is sufficient to support my client's entry of guilty pleas pursuant to this agreement.



MARK SEDLANDER
Attorney for Defendant
MARLON CORNEJO

October 8, 2021
Date